

Exhibit G

Zachary Thorington Deposition Excerpts

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF WYOMING
3 RYAN DAVIS, an individual,) Case No.: 23-CV-230-S
4 Plaintiff,)
5 vs.)
6 THE CITY OF POWELL,)
7 WYOMING, ET AL.,)
8 Defendants.)
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DEPOSITION OF ZACHARY M. THORINGTON
TAKEN ON BEHALF OF THE PLAINTIFF
AT POWELL, WYOMING
OCTOBER 2, 2024 AT 10:54 A.M.

REPORTED BY:
JOAN F. MARSHALL, C.S.R.
Notary Public

Two Sisters Reporting Service
(307) 438-1629

1 would have to look at our organizational chart, but
2 that sounds pretty reasonable.

3 Q. You are the final decision maker on
4 hiring and firing those staff members, though; is
5 that correct?

6 A. That is correct.

7 Q. Of the 65 full time and full staff and
8 the 20 to 25 part time, would there be any of those
9 where you would not be directly involved in the
10 hiring or firing?

11 A. No.

12 Q. Okay. Well, thanks for those preliminary
13 matters.

14 Now, I don't imagine our deposition will
15 last seven hours. Isn't that good news? I think
16 we'll be here for an hour or two. Just so you
17 know, you've sworn that you'll tell the truth,
18 correct?

19 A. That's correct.

20 Q. You understand that your testimony here
21 is subject to the penalty of perjury?

22 A. I do.

23 Q. And you commit to tell the truth to the
24 best of your knowledge?

25 A. That's correct.

1 When did you first learn that Officer
2 Davis was sick or had a medical issue?

3 A. I don't have a specific date.

4 Q. Do you remember if it was October of 2021
5 or November of 2021?

6 MR. THOMPSON: Objection as to form.

7 A. I don't remember exact date.

8 BY MR. DANIEL WILKERSON:

9 Q. Do you remember ever being informed that
10 he had COVID?

11 A. I do remember being informed that he had
12 COVID.

13 Q. And do you remember being informed that
14 he was on workers' comp?

15 A. I do remember the conversation with HR,
16 Tiffany Brando, of a workmen's comp claim.

17 Q. Do you remember that he was on FMLA?

18 A. I do remember that he was on FMLA.

19 Q. Workers' comp and FMLA would have been
20 handled through HR, though, correct?

21 A. That is correct.

22 Q. You weren't making any direct decisions?

23 A. I don't make direct decisions on or sign
24 the paperwork for workmen's comp and HR -- or FMLA.

25 Q. What prompted you to make the decision to